

BURSOR & FISHER, P.A.

Neal J. Deckant (State Bar No. 322946)
1990 North California Blvd., 9th Floor
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Email: ndeckant@bursor.com

GEORGE FELDMAN MCDONALD, PLLC

Lori G. Feldman (*pro hac vice*)
Michael Liskow (State Bar No. 243899)
200 Park Avenue, Suite 1700
New York, New York 10166
Telephone: (646) 354-6534
E-mail: lfeldman@4-justice.com
mliskow@4-justice.com

Attorneys for Plaintiff

Additional Attorneys on Signature Page

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE META PIXEL TAX FILINGS CASES

Master File No. 5:22-cv-07557-PCP (VKD)

This document relates to:

All actions

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL**

The Honorable P. Casey Pitts
Courtroom 8, 4th Floor

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT pursuant to Northern District of California Civil Rule Local Rules 7-11 and 79-5, and the protective order issued in the case (Dkt. No. 74), Plaintiffs hereby move the Court for an order allowing them to file under seal excerpts and quotations from documents containing information designated by Defendant Meta Platforms (“Meta”) as either Confidential or Highly Confidential – Attorney’s Eyes Only, and submitted by Plaintiffs in support of their Reply in Support of Motion for Class Certification. Plaintiffs state that the “compelling reasons” standard applies. *See Zheng-Lawson v. Toyota Motor Corp.*, 2019 WL 3413253, at *2-3 (N.D. Cal. July 29, 2019). Plaintiffs submit this request only to comply with their obligations under Local Rule 79-5 and the protective order issued in the case, and Plaintiffs take no position at this time on the propriety of Meta’s confidentiality designations, or whether they meet the compelling reasons test for retaining confidentiality. As to Plaintiffs’ expert reports, the reports cite information throughout designated by Meta as either Confidential or Highly Confidential – Attorney’s Eyes Only by Meta.

Plaintiffs propose that the following materials designated as either Confidential or Highly Confidential – Attorney’s Eyes Only by Meta should be sealed:

Document	Portions of Documents to be Sealed
Plaintiffs’ Reply in Support of Class Certification (“Reply”)	Page 8: lines 5-6 Page 11: lines 2-3, 14-16
Ex. 1 to Deckant Declaration in Support of Reply (<i>Meta Letter</i>)	Entirely Under Seal
Ex. 2 to Deckant Declaration in Support of Reply (<i>30(b)(6) Deposition Transcript</i>)	Page 49: lines 12-20, 25 Page 124: lines 1-5, 8-11, 13, 19-21, 23 Page 125: lines 11, 15-16, 18, 22-25
Ex. 3 to Deckant Declaration in Support of Reply (<i>Wooldridge Deposition Transcript</i>)	Entirely Under Seal
Ex. 4 to Deckant Declaration in Support of Reply (<i>Zeidman Reply Report</i>)	Entirely Under Seal
Plaintiffs’ Opposition to Defendant’s Daubert Motion to Strike or Exclude the Opinions of	Page 2: lines 13-14 Page 3: lines 5, 11, 13-15

1	Plaintiff's Expert Colin B. Weir ("Opp. to Weir Daubert")	
2	Ex. 1 to Liskow Decl. in Support	Page 112: lines 7-8, 20
3	of Opp. to Weir Daubert (<i>Weir</i>	Page 125: lines 11-15
4	<i>Deposition Transcript</i>)	Page 126: lines 20-21
5	Plaintiffs' Opposition to	Page 2: lines 4-6
6	Defendant's Motion to Exclude	Page 5: lines 3-5, 7-13, 27-28
7	the Expert Report and Testimony	Page 6: lines 3-4, 17-23
8	of Robert Zeidman ("Opp. to	Page 7: lines 4-10, 12-15
9	Zeidman Daubert")	Page 8: lines 18-20
10		Page 9: lines 14-21, 23-28
11		Page 10: lines 1-3, 12-14
12		Page 11: lines 2-6
13		Page 12: lines 6-9, 13-17, 21-26
14		Page 13: lines 9-11, 15-21, 23, 28
15		Page 14: lines 1, 3-4, 21-25
16		Page 15: lines 11-16, 20-24
17		Page 16: lines 23
18		Page 17: lines 2, 12-14
19		Page 18: lines 1
20		Page 19: lines 1-28
21		Page 20: lines 1-5
22		Page 21: lines 10, 18-26
23		Page 22: lines 15-18, 20-28
24		Page 23: lines 1
25	Ex. A to Baxter-Kauf Decl. in	Page 67: lines 21-22
26	Support of Opp. to Zeidman	Page 68: lines 3-9, 13-16, 24-25
27	Daubert (<i>Zeidman Deposition</i>	Page 71: lines 24
28	<i>Transcript</i>)	Page 72: lines 4, 7
		Page 76: lines 1-4
		Page 77: lines 8-9
		Page 93: lines 5
		Page 146: lines 1-3, 5-6, 8-9, 11-13, 15-19
	Ex. B to Baxter-Kauf Decl. in	Entirely Under Seal
	Support of Opp. to Zeidman	
	Daubert (<i>Zervas Deposition</i>	
	<i>Transcript</i>)	

1 Dated: December 15, 2025

GEORGE FELDMAN MCDONALD, PLLC

2 By: /s/ Michael Liskow
Michael Liskow

3
4 Lori G. Feldman (*pro hac vice*)
Michael Liskow (State Bar No. 243899)
102 Half Moon Bay Drive
5 Croton-on-Hudson, NY 10520
Telephone: (917) 983-9321
6 E-mail: lfeldman@4-justice.com
mliskow@4-justice.com

7
8 **BURSOR & FISHER, P.A.**

Neal Deckant (State Bar No. 322946)
1990 North California Blvd., Suite 940
9 Walnut Creek, CA 94596
Telephone: (925) 300-4455
10 Facsimile: (925) 407-2700
Email: ndeckant@bursor.com

11
12 **SMITH KRIVOSHEY, P.C.**

Joel D. Smith (State Bar No. 244902)
867 Boylston Street, 5th Floor
13 Boston, MA 02216
Telephone: 617-377-7404
14 Email: joel@skclassactions.com

15
16 **GEORGE FELDMAN MCDONALD, PLLC**

Rebecca A. Peterson (State Bar No. 241858)
1650 West 82nd Street, Suite 880
17 Bloomington, MN 55431
Telephone: (612) 778-9595
Facsimile: (888) 421-4173
18 E-mail: rpeterson@4-Justice.com

19
20 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

Kate M. Baxter-Kauf (*pro hac vice*)
100 Washington Avenue South, Suite 2200
21 Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
22 E-mail: kmbaxter-kauf@locklaw.com

23
24 **THE HODA LAW FIRM, PLLC**

Marshal J. Hoda, Esq. (*pro hac vice*)
12333 Sowden Road, Suite B
25 Houston, TX 77080
Telephone: (832) 848-0036
Email: marshal@thehodalawfirm.com

26
27 **FOSTER YARBOROUGH PLLC**

Patrick Yarborough, Esq. (*pro hac vice*)
917 Franklin Street, Suite 220
28 Houston, TX 77002

1 Telephone: (713) 331-5254
2 Email: patrick@fosteryarborough.com

3 **EMERSON FIRM, PLLC**
4 John G. Emerson (*pro hac vice*)
5 2500 Wilcrest, Suite 300
6 Houston, TX 77042
7 Telephone: (800) 551-8649
8 Email: jemerson@emersonfirm.com

9 *Attorneys for Plaintiffs*
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